



April 27, 2023

**By ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Suite 1960  
New York, NY 10007

Re: *Ilaria Bulgari v. Veronica Bulgari*, 22 Civ. 5072 (LGS)

Dear Judge Lehrburger:

Plaintiff files this letter motion seeking leave to file under seal her application to compel Stephan Haimo to sit for a further deposition. The redacted portions contain material designated as confidential.

Respectfully Submitted,

/s/ David Boies

David Boies  
BOIES SCHILLER FLEXNER LLP  
333 Main Street  
Armonk, New York 10504  
Telephone: (914) 749-8200  
E-mail: dboies@bsfllp.com

Matthew L. Schwartz  
David L. Simons  
BOIES SCHILLER FLEXNER LLP  
55 Hudson Yards  
New York, New York 10001  
Telephone: (212) 303-3646  
E-mail: mlschwartz@bsfllp.com  
dsimons@bsfllp.com

**BSF**

/s/ Peter M. Skinner

Peter M. Skinner  
Morrison & Foerster LLP  
250 West 55th Street  
New York, NY 10019  
212-468-8000  
Fax: 212-468-7900  
Email: pskinner@mofo.com

*Counsel for Plaintiff Ilaria Bulgari*

cc: Counsel of record by ECF

Granted.

SO ORDERED:

5/3/2023



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE